

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

In Re:

**Michael Alan Hale
Larissa Kaye Hale**

Debtors

**Case No. 11-13374
Chapter 13**

**MOTION TO MODIFY CHAPTER 13 PLAN
and FOR COMPENSATION AND REIMBURSEMENT OF EXPENSES,
NOTICE OF OPPORTUNITY FOR HEARING,
WITH BRIEF COMBINED**

COMES NOW the above named Debtors and move the Court, pursuant to Title 11 U.S.C. Section 1329, for the issuance of its Order modifying the Confirmed Chapter 13 plan in the following particulars, to-wit:

1. To suspend Debtors' January, 2014 plan payment.
2. To provide that Debtors are deemed current on plan payments through January 31, 2014.
3. To increase Debtors' plan payment to \$3,550.00 per month beginning February, 2014.
4. To provide that payments on secured claims shall be adjusted prorata while administrative claims are being paid.
5. To provide that Debtors' attorney shall be allowed \$500.00 in attorney fees, \$2.94 in postage expenses, and \$4.80 copy costs, totaling \$507.74, without the necessity of submitting time and expense records, which shall be an administrative claim in this case and shall be paid at the rate of \$75.00 per month.

WHEREFORE, Debtors pray for the requested modifications.

Respectfully submitted,

/s/ Kenneth C. McCoy

Kenneth C. McCoy, OBA#5926

8265 South Walker

Oklahoma City, OK 73139

(405) 631-0981

Attorney for Debtors

11-0032

NOTICE OF OPPORTUNITY FOR HEARING AND TIME FOR RESPONSE:

Your rights may be affected. You should read this document carefully and consult your attorney about your rights and the effect of this document. If you do not want the Court to grant the requested relief, or you wish to have your views considered, you must file a written Response or Objection to the requested relief with the Clerk of the United States Bankruptcy Court For The Western District Of Oklahoma, 215 Dean A. McGee Avenue, Oklahoma City,

Oklahoma, 73102, no later than twenty-one (21) days from the date of the filing of this request for relief. You should also serve a file-stamped copy of your Response or Objection to the above signed attorney for the Debtor(s) (and others who are required to be served) and file a Certificate Of Service with the Court. If no Response or Objection is timely filed, the Court may grant the requested relief without a hearing or further notice.

The time period for the filing of your Response or Objection above set forth includes the three (3) days allowed for mailing provided for in Bankruptcy Rule 9006(f).

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the date of its filing a true and correct copy of this pleading was:

1. Electronically transmitted to the following listed parties by the Court's CM/ECF electronic noticing system:

- Pat Brown patnotices@mikeloyd.com
- Julie M Ezell bankruptcy@tax.ok.gov
- John T. Hardeman 13trustee@chp13okc.com, trustee@chp13okc.com
- Joe M Lozano notice@bkcyllaw.com
- Kenneth Clay McCoy kmccoy_aba@yahoo.com
- L Ruschenberg trustee@chp13okc.com, 13trustee@chp13okc.com
- U.S. Trustee Ustpreion20.oc.ecf@usdoj.gov

2. Mailed with proper postage prepaid thereon to the following:

Mike & Larissa Hale
833 N. Hiwassee Rd.
Choctaw, OK 73020

Texas Guaranteed Student Loan Corp
Attn: Bankruptcy
PO BOX 83100
Round Rock, TX 78683

Jefferson Capital Systems LLC
PO BOX 7999
ST CLOUD, MN 56302-9617

GE Capital Retail Bank
c/o Recovery Management Systems
Corporat
25 SE 2nd Avenue, Suite 1120
Miami, FL 33131-1605

National Capital Management, LLC
8245 Tournament Dr, Ste 230
Memphis, TN 38125

Ocwen Loan Servicing, LLC
1661 Worthington Road
Suite #100
WEST PALM BEACH, FL 33409

/s/ Kenneth C. McCoy
Kenneth C. McCoy, OBA #5926
Attorney for Debtors 11-0032